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Attorneys for Defendants,

Hilton Franchise Holding, LLC; Hilton Domestic Operating Company, Inc.;

Hilton Worldwide Holdings, Inc.; WMK Portland LLC; and Grace Lial

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

SCOTT KOCHER, in his capacity as Personal
Representative of The Estate of ASHLEY BENSON

Plaintiff,

vs.

HILTON WORLDWIDE HOLDINGS, INC.;
HILTON DOMESTIC OPERATING COMPANY,
INC.; HILTON FRANCHISE HOLDING, LLC;
WMK PORTLAND LLC; GRACE LIAL;
MEDALIST HOLDINGS, LLC; LEEWARD
HOLDINGS, LLC; CAMARILLO HOLDINGS,
LLC; DARTMOOR HOLDINGS, LLC; IC
HOLDINGS, LLC; BACKPAGE.COM, LLC; UGC
TECH GROUP C.V.; WEBSITE TECHNOLOGIES,
LLC; ATLANTISCHE BEDRIJVEN C.V.;
AMSTEL RIVER HOLDINGS, LLC; LUPINE
HOLDINGS, LLC; KICKAPOO RIVER
INVESTMENTS, LLC; CF HOLDINGS GP, LLC;
CF ACQUISITIONS, LLC; CARL FERRER;
MICHAEL LACEY; JAMES LARKIN; AND
JOHN DOES 1-5,

Defendants.

CASE NO. 3:18-cv-00449-SB

**UNOPPOSED MOTION TO
EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT PURSUANT TO
FED.R.CIV.P. 6(b)**

CERTIFICATE OF COMPLIANCE WITH L.R. 7.1

Counsel for defendants Hilton Worldwide Holdings, Inc., Hilton Domestic Operating Company, Inc., Hilton Franchise Holding, LLC, WMK Portland, LLC (“Hilton defendants”), and Grace Lial (“Lial”) certifies that she has conferred in good faith with counsel for plaintiff concerning the matter herein, and that plaintiff does not object to this request. Counsel for Hilton defendants and Lial further certifies that she has conferred with counsel for defendants Leeward Holdings, LLC, Camarillo Holdings, LLC, Dartmoor Holdings, LLC, IC Holdings, LLC, Backpage.com, LLC, Website Technologies, LLC, Amstel River Holdings, LLC, Lupine Holdings, LLC, Kickapoo River Investments, LLC, CF Holdings GP, LLC, CF Acquisitions, LLC, Carl Ferrer, Michael Lacey and James Larkin (who have collectively filed a similar unopposed motion), who also does not oppose this request.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), Hilton defendants and Lial move the Court for an order extending the deadline to respond to the complaint until 10 days after the Court’s final ruling on Plaintiff’s anticipated motion to remand. The Court has not granted any previous extension of time in this matter.

POINTS AND AUTHORITIES

Defendants Ferrer, Lacey, and Larkin removed this case on Wednesday, March 14, 2018. Under Fed. R. Civ. P. 81(c)(2)(C), all defendants’ responses are due to be filed with the Court on March 21, 2018. Counsel for Hilton defendants and Lial, Julie Bardacke Haddon, conferred by email with counsel for Plaintiff, Janis Puracal, who confirmed by return email that she consents to the extension of the deadline to respond to the complaint requested herein.

In light of the anticipated motion to remand, and the complex nature of the issues raised in the removal petition, Hilton defendants and Lial agree that this case will proceed most efficiently if all defendants are allowed to delay filing responses to the complaint until after the Court has determined whether or not the case will proceed in this Court.

This motion is made in good faith.

Dated: March 21, 2018

GORDON REES SCULLY MANSUKHANI, LLP

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